

Ex Parte

VIA ELECTRONIC FILING

July 14, 2021

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
45 L Street NE
Washington, DC 20554

Re: Incumbent Earth Stations in the 3.7-4.2 GHz Band, IB Docket No. 20-205, 18-122, 20-173

Dear Ms. Dortch:

RSM US LLP ("RSM"), acting as the Relocation Coordinator, continues to work closely with the C-band satellite operators – Embratel, Eutelsat, Intelsat, SES, and Telesat – to ensure all incumbent earth stations are properly migrated within the relocation deadlines defined for the 3.7-4.2 GHz band transition. The Relocation Coordinator is responsible for reaching out to earth station operators with antennas for which none of the C-band satellite operators has taken responsibility for implementing the transition, and the satellite operators have been taking the lead on reaching out to earth station operators with antennas that are on their Transition Plans. Together, the Relocation Coordinator and satellite operators manage a process for sharing outreach results based on the incumbent earth station records found in the FCC Incumbent Earth Station List.¹

Outreach efforts have included phone, email, and certified letters to the registered points of contact listed in the International Bureau Filing System (IBFS) and/or additional contacts obtained from industry partners. A number of earth station operators have been reached and have provided clarifying details to inform the transition activities and subsequently the Satellite Operator Transition Plans.

The Relocation Coordinator submitted a filing on January 14, 2021, with outreach results regarding reportedly inactive earth stations², as well as incumbent earth station operators that the Relocation Coordinator and satellite operators had been unable to reach regarding specific earth station antennas.³

The Relocation Coordinator files this letter to provide the International Bureau with certain outreach results requested by the International Bureau regarding earth station operators and antennas not included in the January 14, 2021 filing. This letter represents the joint findings from the satellite operator and Relocation Coordinator outreach efforts.

First, one result of these further outreach efforts is a list of earth station antennas – set out under the first tab of the attachment – which were not included in our January 14, 2021 filing. Each antenna on this list was identified by their earth station operator as no longer receiving service from a C-band satellite, despite the fact that the FCC IBFS continues to include the antenna as active.

¹ *International Bureau Releases Updated List of Incumbent Earth Stations in the 3.7-4.2 GHz Band in the Contiguous United States*, Public Notice, DA 21-731, IB Docket No. 20-205, 20-305 (rel. Jun. 22, 2021), available at <https://www.fcc.gov/document/ib-issues-updated-37-ghz-incumbent-earth-station-list>.

² These are earth station antennas whose operators have affirmatively disclosed - to either the Relocation Coordinator or a C-band satellite operator – that their earth station antennas have discontinued operations.

³ RSM filed an ex-parte letter to provide the International Bureau with the joint findings from the satellite operator and Relocation Coordinator outreach efforts. See Letter from Sanga Chandel, RSM US LLP to Marlene H Dortch, Secretary, FCC, IB at 1 (Jan. 14, 2021) (on file in IB 20-205).

Second, as explained in our January 14, 2021 filing above, the satellite operators and Relocation Coordinator had not been able to reach certain incumbent earth station operators regarding specific earth station antennas. That filing identified “unable to reach” specific earth station operators and antennas. We here report that there are no such earth stations in addition to those already listed in the January 14, 2021 filing.

Finally, we report that some of the earth station operators with which the Relocation Coordinator team was previously corresponding are no longer responsive to extensive continued outreach efforts by the Relocation Coordinator team. These earth station operators, which are not on any satellite operator Transition Plan, are listed in the second tab in the attachment to this filing.

The Relocation Coordinator submits these collective outreach findings, current as of July 08, 2021, to the FCC for further consideration as it relates to the C-band transition. The Relocation Coordinator looks forward to continued coordination with the incumbent earth station operators to ensure all earth stations are properly transitioned. Please contact the undersigned with any questions.

Respectfully submitted,

/s/ Sanga Chandel
RSM US LLP